

JANE DOE	*	IN THE
Plaintiff	*	UNITED STATES DISTRICT COURT
v.	*	FOR THE
INDEPENDENCE COURT OF HYATTSVILLE, LP, <i>et al.</i>	*	DISTRICT OF MARYLAND
Defendants	*	Civil Action No. _____
	*	
* * * * *		

**NOTICE OF REMOVAL**

**TO THE JUDGES OF THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

Defendants Independence Court of Hyattsville, LP and Priority Life Care, LLC, by and through their counsel, Jessica P. Butkera and Cipriani & Werner, P.C., hereby files this Notice of Removal and states:

1. A Complaint was filed against Defendants Independence Court of Hyattsville, LP and Priority Life Care, LLC in the Circuit Court for Prince Georges County in the matter of Jane Doe v. Independence Court of Hyattsville, LP, Case No.: C-16-CV-25-001905, a copy of which is attached hereto as Exhibit A.
2. Defendants Independence Court of Hyattsville, LP and Priority Life Care, LLC filed an Answer and a Notice of Removal, copies of which are attached hereto as Exhibits B and C.
3. The above-described action is a civil action in the State of Maryland.
4. The Plaintiff is a resident of the State of Maryland.

5. Defendant Independence Court of Hyattsville, LP is a resident of Commonwealth of Pennsylvania.

6. Defendant Priority Life Care, LLC is a resident of the State of Indiana.

7. This Court has original jurisdiction under Title 28, United States Code, §1332, and this action is one which may be removed to this Court pursuant to the provisions of Title 28, United Code, §1441, in that it is a civil action in which the amount in controversy exceeds the sum or value of \$75,000.00, exclusive of interest and cost and is between citizens of different States.

8. Attached as Exhibits D and E are two Orders issued by the Circuit Court for Prince Georges County.

Respectfully submitted,

/s/ Jessica P. Butkera

Jessica P. Butkera (Federal Bar No.: 29875)

Cipriani & Werner, P.C.

6411 Ivy Lane, Suite 600

Greenbelt, Maryland 20770

410-420-0700

[jbutkera@c-wlaw.com](mailto:jbutkera@c-wlaw.com)

*Attorneys for Defendants Independence Court of  
Hyattsville, LP and Priority Life Care, LLC*

**I HEREBY SOLEMNLY DECLARE AND AFFIRM** under the penalties of perjury that the facts herein states are true and correct to the best of my knowledge, information and belief.

/s/ Jessica P. Butkera  
Jessica P. Butkera (Federal Bar No.: 29875)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 22<sup>nd</sup> day of May, 2025, a copy of the foregoing was filed and served by electronic submissions via CM/ECF, in accordance with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Maryland, and was mailed first-class, postage prepaid, to:

Sarah L. Smith, Esq.  
Schlachman, Belsky, Weiner & Davey, P.A.  
300 East Lombard Street, Suite 1100  
Baltimore, Maryland 21202  
[ssmith@sbwdlaw.com](mailto:ssmith@sbwdlaw.com)  
*Attorneys for Plaintiff*

/s/ Jessica P. Butkera  
Jessica P. Butkera (Federal Bar No.: 29875)